

Carl Daly/R8/USEPA/US

11/08/2012 04:15 PM

To: Cole Anderson

cc: Steve Dietrich, Tina Anderson

bcc:

Subject: Re: 2 Questions on General Conformity

Thanks Tina and Cole.

Carl Daly 303-312-6416

Cole Anderson

Carl, Attached are the permit examples...

11/08/2012 03:21:41 PM

From: Cole Anderson <cole.anderson@wyo.gov>
To: Carl Daly/R8/USEPA/US@EPA
Cc: Steve Dietrich <steve.dietrich@wyo.gov>, Tina Anderson <tina.anderson@wyo.gov>
Date: 11/08/2012 03:21 PM
Subject: Re: 2 Questions on General Conformity

Carl,

Attached are the permit examples Tina referenced in her last email. Two documents, 13400ana.pdf and 13194ana.pdf, are final analyses that were drafted for oil and gas sites in the non-attainment area. We organize our analyses (a.k.a. statement of basis) to address the proposed project and applicable regulations in the beginning. Next we list our proposed permit conditions. Finally, we include emissions tables and a table showing the offset calculation for the proposed project,

Also attached to the email are electronic versions of spreadsheets that we generate for each application. The spreadsheet is one large table of all permitting actions for the company that involve offsets. This spreadsheet and the Division's analysis are published for public comment.

No comments were received on these two applications. Final permits for both applications were issued on July 24, 2012. Electronic copies of the final permits are attached.

If you have any questions, please don't hesitate to contact me.

Best regards,

Cole Anderson

New Source Review Program Manager

Wyoming DEQ

Air Quality Division

Herschler Building, 2E

122 West 25th St.

Cheyenne, WY 82002

Phone: (307) 777-5924 FAX: (307) 777-5616

Email: cole.anderson@wyo.gov

On Thu, Nov 8, 2012 at 10:36 AM, Tina Anderson <tina.anderson@wyo.gov> wrote:

Carl,

You called Steve and I yesterday with a couple of followup questions from our general conformity meeting. Cole Anderson is pulling up some permit examples that you requested and we will forward those to you soon. In response to your other question regarding a remark by BLM about emissions associated with APDs, we can tell you that the estimate probably should have been expressed as hundreds of tons not thousands. Furthermore, the estimate is high largely because of mobile sources (such as haul trucks and vehicle traffic etc.) and the non-road component (drill engines, fracking engines, completion engines etc.). As you know, we don't regulate either mobile category through permitting so these are generally numbers not accounted for in a minor source permit. General Conformity, however, requires that the Federal Agency look at all emissions associated with a well pad, so those estimates are higher than what you see in a permit. The permits continue to be minor source permits. The permits will sometimes include the drill rig emissions if the company has volunteered to submit to that process, but even those controlled scenarios are handled through minor source permits. Nevertheless, the federal agency is still left with the problem of emissions over the de minimus for individual APDs, and the degree to which those emissions are over is largely dependent upon whether the Federal agency can exclude the permitted portion. I hope this addresses your concern. Please feel free to call Steve, or myself if you have further questions. Many thanks to you and Kate and Tim for making the trip up to Cheyenne.

Tina

--

Christine (Tina) Anderson
State Implementation Planning and Rule Development
Air Quality Division, State of Wyoming
[307-675-5624](tel:307-675-5624)
tina.anderson@wyo.gov

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[attachment "13400ana.pdf" deleted by Carl Daly/R8/USEPA/US]
[attachment "13400offset.pdf" deleted by Carl Daly/R8/USEPA/US]
[attachment "13194ana.pdf" deleted by Carl Daly/R8/USEPA/US]
[attachment "13194offset.pdf" deleted by Carl Daly/R8/USEPA/US]
[attachment "13400per.pdf" deleted by Carl Daly/R8/USEPA/US]
[attachment "13194per.pdf" deleted by Carl Daly/R8/USEPA/US]

Carl Daly/R8/USEPA/US

09/04/2012 12:16 PM

To Kate Fay, Kenneth Distler, Sara Laumann, Scott Jackson,
Suzanne Bohan, Tim Russ

cc Callie Videtich

bcc

Subject WY General Conformity Questions: Meeting Room TBD

Meeting

Date 09/06/2012

Time 08:30:00 AM to 09:15:00 AM

Chair Carl Daly

Invitees

Required Kate Fay; Kenneth Distler; Sara Laumann; Scott Jackson; Suzanne Bohan;
Tim Russ

Optional Callie Videtich

FYI

Location

I talked to WY DEQ today and they confirmed that they have the same understanding as BLM concerning the GC exemption for sources issued minor NSR permits - including sources such as drill rigs. WY believes that if they issue an NSR permit, whether that permit was required or just requested (such as for a drill rig), that permitted source should be exempted from GC. So, we need to discuss the Agency's position on this permit exemption quickly so we can get back to BLM and the DEQ quickly. Thanks

Carl Daly/R8/USEPA/US

09/05/2012 06:58 AM

To Sara Laumann, Kate Fay, Suzanne Bohan, Tim Russ, Scott Jackson, Kenneth Distler, Callie Videtich

cc

bcc

Subject Information Update - Location has changed: WY General
Conformity Questions: Meeting Room TBD

I talked to WY DEQ today and they confirmed that they have the same understanding as BLM concerning the GC exemption for sources issued minor NSR permits - including sources such as drill rigs. WY believes that if they issue an NSR permit, whether that permit was required or just requested (such as for a drill rig), that permitted source should be exempted from GC. So, we need to discuss the Agency's position on this permit exemption quickly so we can get back to BLM and the DEQ quickly. Thanks

Carl Daly/R8/USEPA/US
03/06/2012 09:58 AM

To: Sara Laumann, Tim Russ, Morales.monica, Kate Fay,
Kenneth Distler, Scott Jackson, Jody Ostendorf, Tom Coda
cc
bcc
Subject: Fw: NPL EIS Conformity White Paper

Just got this from WY - Encana's white paper on general conformity.

Carl Daly 303-312-6416

----- Forwarded by Carl Daly/R8/USEPA/US on 03/06/2012 09:57 AM -----

From: Steve Dietrich <steve.dietrich@wyo.gov>
To: Carl Daly/R8/USEPA/US@EPA
Date: 03/06/2012 09:46 AM
Subject: Fwd: NPL EIS Conformity White Paper

Here you go.

Steven A. Dietrich, P.E.

AQD Administrator
Wyoming DEQ
122 West 25th Street
Cheyenne, WY 82002

E-mail: Steve.Dietrich@wyo.gov
Phone: (307) 777-7391
Fax: (307) 777-5616

----- Forwarded message -----

From: **Shaffron, Michael** <Michael.Shaffron@encana.com>
Date: Tue, Feb 28, 2012 at 2:04 PM
Subject: NPL EIS Conformity White Paper
To: "dsimpson@blm.gov" <dsimpson@blm.gov>, "sdefores@blm.gov" <sdefores@blm.gov>, "bohan.suzanne@epa.gov" <bohan.suzanne@epa.gov>, "Corra@wyo.gov" <Corra@wyo.gov>, "Steve.Dietrich@wyo.gov" <Steve.Dietrich@wyo.gov>, "darla.potter@wyo.gov" <darla.potter@wyo.gov>
Cc: "Ulrich, Paul" <Paul.Ulrich@encana.com>, "Phillips, Randy" <Randal.Phillips@encana.com>, "Enger, Erika Z." <Erika.Enger@encana.com>, "Gwaltney, Julia" <Julia.Gwaltney@encana.com>, "Stewart, David A." <David.Stewart@encana.com>, "Buehler, Lauren C." <Lauren.Buehler@encana.com>, "Gardner, John C." <John.Gardner@encana.com>

Dear Interagency Team Members:

Encana has prepared the attached White Paper which addresses Aspects and Impacts of an impending Ozone Nonattainment Designation and Conformity Issues related to

the proposed Normally Pressured Lance (NPL) natural gas development project and associated Environmental Impact Statement (EIS) project. We hope you will find this document helpful when discussing how the proposed Upper Green River Basin Marginal Ozone Nonattainment Area may affect the continued progress of the NPL EIS.

Thank You,

Mike S.

Mike Shaffron, P.E.

NRBU EHS Lead - Permitting & Compliance

Encana Oil & Gas (USA) Inc .

Republic Plaza

370 17th Street, Suite 1700

Denver, CO 80202

Phone: [\(720\) 876-5155](tel:(720)876-5155)

Fax: [\(720\) 876-6155](tel:(720)876-6155)

Cell: [\(720\) 375-4888](tel:(720)375-4888)

Email: michael.shaffron@encana.com

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<http://www.encana.com>

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Conformity White Paper.pdf

Carl Daly/R8/USEPA/US

10/18/2012 11:55 AM

To Suzanne Bohan

cc

bcc

Subject Re: Can you give me feedback on tentative dates re general conformity meeting?

Talked with my folks yesterday (and with Bob Ward today). It looks like the 11/6 and 11/7 dates work best for us for a meeting with BLM in Cheyenne.

Carl Daly 303-312-6416

Suzanne Bohan

Thanks! Suzanne J. Bohan

10/18/2012 11:43:33 AM

From: Suzanne Bohan/R8/USEPA/US

To: Carl Daly/R8/USEPA/US@EPA

Date: 10/18/2012 11:43 AM

Subject: Can you give me feedback on tentative dates re general conformity meeting?

Thanks!

Suzanne J. Bohan

Director, NEPA Compliance and Review Program

U.S. Environmental Protection Agency, Region 8

1595 Wynkoop

Denver, CO 80202-1129

Phone: (303) 312-6925

E-mail: bohan.suzanne@epa.gov

Carl Daly/R8/USEPA/US

11/08/2012 04:19 PM

To Tim Russ, Sara Laumann, Scott Jackson

cc

bcc

Subject Fw: 2 Questions on General Conformity

Here are the example minor sources permits from WY.

Carl Daly 303-312-6416

----- Forwarded by Carl Daly/R8/USEPA/US on 11/08/2012 04:18 PM -----

From: Cole Anderson <cole.anderson@wyo.gov>
To: Carl Daly/R8/USEPA/US@EPA
Cc: Steve Dietrich <steve.dietrich@wyo.gov>, Tina Anderson <tina.anderson@wyo.gov>
Date: 11/08/2012 03:21 PM
Subject: Re: 2 Questions on General Conformity

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Cole Anderson

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Cheyenne, WY 82002

Phone: (307) 777-5924 FAX: (307) 777-5616

Email: cole.anderson@wyo.gov

On Thu, Nov 8, 2012 at 10:36 AM, Tina Anderson <tina.anderson@wyo.gov> wrote:

Carl,

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Tina

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Christine (Tina) Anderson
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tina.anderson@wyo.gov

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13400ana.pdf



13400offset.pdf



13194ana.pdf



13194offset.pdf



13400per.pdf



13194per.pdf

Carl Daly/R8/USEPA/US

11/08/2012 11:51 AM

To Tim Russ, Sara Laumann, Scott Jackson

cc Kate Fay, Suzanne Bohan

bcc

Subject Fw: 2 Questions on General Conformity

Here is the answer I got back from Tina on the question of BLM showing general conformity on an APD basis.

Carl Daly 303-312-6416

----- Forwarded by Carl Daly/R8/USEPA/US on 11/08/2012 11:39 AM -----

From: Tina Anderson <tina.anderson@wyo.gov>
To: Carl Daly/R8/USEPA/US@EPA
Cc: Steve Dietrich <steve.dietrich@wyo.gov>, Cole Anderson <cole.anderson@wyo.gov>
Date: 11/08/2012 10:36 AM
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Carl Daly/R8/USEPA/US

08/30/2012 08:16 AM

To "Tim Russ", Christopher Razzazian, "Scott Jackson"

cc "rothery deirdre"

bcc

Subject Fw: General Conformity

FYI on this GC email to BLM. If the call happens Weds I will be in UT so Scott will be acting for (like) me.
Carl Daly 303-312-6416

Kate Fay

----- Original Message -----

From: Kate Fay

Sent: 08/30/2012 08:00 AM MDT

To: john.corra@wyo.gov; "Simpson, Donald A" <dsimpson@blm.gov>; "Green, Buddy W" <bwgreen@blm.gov>; steve.dietrich@wyo.gov

Cc: Carl Daly; Suzanne Bohan

Subject: General Conformity

All:

We have completed our "internal due diligence" on the follow-up questions (listed below) that both BLM and WDEQ have asked us regarding general conformity as it affects oil and gas development in Wyoming. We would like very much to meet with you/your staff BEFORE your planned meeting next week with the industry to discuss answers to these questions. I think what we have found is key to your message to the industry so I strongly urge that we talk beforehand. I am not sure when your meeting is scheduled, but we can make just about anytime work next week (except Monday, since it is a holiday).

- 1) When does general conformity start to apply in the Upper Green River Basin (UGRB) marginal ozone nonattainment area?
- 2) What general conformity provisions would govern BLM's conformity evaluations in the UGRB marginal ozone nonattainment area?
- 3) Starting July 20, 2013, does BLM have to perform conformity evaluations for new Approvals for Permits to Drill (APDs) in the UGRB that are based on Records of Decision /Final Environmental Impact Statements issued before July 20, 2013?
- 4) To what degree can BLM rely on WDEQ's minor source rule in developing an approach to meeting general conformity requirements triggered by NEPA-related federal actions?

Thanks and I look forward to hearing from you.

Kate

Many thanks
Kate Fay
Senior Advisor
Energy and Climate
Office of the Regional Administrator
U.S. EPA Region 8
303.910.2830 (cell)
303.312.6432 (office)

Carl Daly/R8/USEPA/US

08/30/2012 08:16 AM

To "Tim Russ", Christopher Razzazian, "Scott Jackson"

cc "rothery deirdre"

bcc

Subject Fw: General Conformity

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Carl Daly 303-312-6416

Kate Fay

----- Original Message -----

From: Kate Fay

Sent: 08/30/2012 08:00 AM MDT

To: john.corra@wyo.gov; "Simpson, Donald A" <dsimpson@blm.gov>; "Green, Buddy W" <bwggreen@blm.gov>; steve.dietrich@wyo.gov

Cc: Carl Daly; Suzanne Bohan

Subject: General Conformity

All:

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Thanks and I look forward to hearing from you.

Kate

Many thanks
Kate Fay
Senior Advisor
Energy and Climate
Office of the Regional Administrator
U.S. EPA Region 8
303.910.2830 (cell)
303.312.6432 (office)

Carl Daly/R8/USEPA/US

10/22/2012 10:11 PM

To "Tim Russ", "Scott Jackson"

cc

bcc

Subject Fw: Fw: Potential dates for EPA/BLM/WYDEQ General
Conformity Meeting

Tim/Scott

Did we send the options paper to Tom and Kristi?

Carl Daly 303-312-6416

From: Kate Fay

Sent: 10/22/2012 11:40 PM EDT

To: Suzanne Bohan; Carl Daly

Subject: Re: Fw: Potential dates for EPA/BLM/WYDEQ General Conformity Meeting

Suzanne

Need some briefing materials for this premeeting. Have they been developed/refined? Want to discuss who attends with the two of you. Thoughts?

From: Suzanne Bohan

Sent: 10/22/2012 09:29 PM MDT

To: Tim Russ; Carl Daly; Kenneth Distler; Sara Laumann; Scott Jackson; Kate Fay

Subject: Re: Fw: Potential dates for EPA/BLM/WYDEQ General Conformity Meeting

We are on for Nov 6th from 10 to 12 in Cheyenne. I'll schedule a pre-meeting so that we can discuss the issues and decide who should attend the meeting.

Suzanne

Suzanne J. Bohan

Director, NEPA Compliance and Review Program

U.S. Environmental Protection Agency, Region 8

1595 Wynkoop

Denver, CO 80202-1129

Phone: (303) 312-6925

E-mail: bohan.suzanne@epa.gov

-----Tim Russ/R8/USEPA/US wrote: -----

To: Suzanne Bohan/R8/USEPA/US@EPA

From: Tim Russ/R8/USEPA/US

Date: 10/22/2012 09:05PM

Cc: Kenneth Distler/R8/USEPA/US@EPA, Scott Jackson/R8/USEPA/US@EPA, Sara Laumann/R8/USEPA/US@EPA, Carl Daly/R8/USEPA/US@EPA

Subject: Re: Fw: Potential dates for EPA/BLM/WYDEQ General Conformity Meeting

Hi Suzanne and Carl,

Ex. 6 - Personal Privacy

. Anytime on the

6th is fine.

Thanks!

Tim

Tim Russ
Environmental Scientist
USEPA Region 8
Air Program
1595 Wynkoop Street (8P-AR)
Denver, CO 80202-1129
Ph. (303) 312-6479
Fax (303) 312-6064
e-mail: russ.tim@epa.gov

Suzanne Bohan---10/19/2012 08:51:57 AM---Folks - Can you keep your calendars open on 11/6 and 11/7 for a potential meeting in Cheyenne? W

From: Suzanne Bohan/R8/USEPA/US
To: Kenneth Distler/R8/USEPA/US@EPA, Tim Russ/R8/USEPA/US@EPA, Scott Jackson/R8/USEPA/US@EPA, Sara Laumann/R8/USEPA/US@EPA
Cc: Carl Daly/R8/USEPA/US@EPA
Date: 10/19/2012 08:51 AM
Subject: Fw: Potential dates for EPA/BLM/WYDEQ General Conformity Meeting

Folks -

Can you keep your calendars open on 11/6 and 11/7 for a potential meeting in Cheyenne? We'll schedule a premeeting to discuss who should attend this general conformity meeting.

Thanks,
Suzanne

Suzanne J. Bohan
Director, NEPA Compliance and Review Program
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop
Denver, CO 80202-1129
Phone: (303) 312-6925
E-mail: bohan.suzanne@epa.gov

-----Forwarded by Suzanne Bohan/R8/USEPA/US on 10/19/2012 08:48AM -----

To: "buddy green" <bwgreen@blm.gov>, ctuers@blm.gov
From: Suzanne Bohan/R8/USEPA/US
Date: 10/19/2012 08:43AM

Cc: Kate Fay/R8/USEPA/US@EPA, Carl Daly/R8/USEPA/US@EPA
Subject: Potential dates for EPA/BLM/WYDEQ General Conformity Meeting

Good morning Buddy and Charis,

We've checked calendars here at EPA and have identified the following times when we would be available for a meeting with you and WYDEQ in Cheyenne to discuss general conformity:

Tuesday, Nov. 6th - any time

Wednesday, Nov. 7th - morning

Please let me know if either of these dates will work for BLM and WYDEQ. We have 6 potential attendees, so I would like to set a firm date and time as soon as possible.

Thanks,

Suzanne

Suzanne J. Bohan
Director, NEPA Compliance and Review Program
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop
Denver, CO 80202-1129
Phone: (303) 312-6925
E-mail: bohan.suzanne@epa.gov

Carl Daly/R8/USEPA/US

09/04/2012 12:16 PM

To

cc

bcc

Subject WY General Conformity Questions: Meeting Room TBD

Meeting

Date 09/06/2012 08:30:00 AM

Time 08:30:00 AM to 09:15:00 AM

Chair Carl Daly

Invitees

Required Sara Laumann; Kate Fay; Suzanne Bohan; Tim Russ; Scott Jackson;
Kenneth Distler

Optional Callie Videtich

FYI

Location Prairie Rose 7th floor

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Janet McCabe/DC/USEPA/US

Sent by: Cindy Huang

12/27/2012 08:57 AM

To Bruce Moore, Carl Daly, David Cozzie, Derrith Watchman-Moore, Jim Martin, Kate Fay, Krishna Viswanathan, Kristi Smith, Mike Koerber, Raj Rao, Sara Laumann, Sara Schneeberg, Scott Jackson, Scott Mathias, Steve Page, Tim Russ, Tom Coda

cc Anna Wood, Daniel Hopkins, Gregory Green, Jean Walker, Johnetta Heilig, Lala Alston, Larke Williams, Lydia Wegman, Maria Sanders, Nancy Perry, Peter Tsirigotis, Richard Wayland

bcc

Subject Rescheduled: Options for BLM to Demonstrate General Conformity for Upper Green River Basin, WY Oil and Gas Projects (Jan 9 02:00 PM EST in ARN-OAR-Room-5415/DC-ARN-OAR@EPA)

OAR Meeting Request Form

Requesting Meeting/Conference Call with: Janet McCabe

Date of this Request: December 12, 2012

Point of Contact (Name/Number): Scott Mathias, 919-541-5310

Technical Point of Contact: Tom Coda, 919-541-3037

Title of Meeting: Options for BLM to Demonstrate General Conformity for Upper Green River Basin, WY Oil and Gas Projects

Purpose of Meeting: DECISIONAL – Obtain concurrence on options available for BLM to rely on Wyoming DEQ's minor source permit regulations to exempt oil and gas projects from inclusion in a General Conformity determination in the Upper Green River Basin 8-hour Ozone Nonattainment Area.

Priority Status (check one): Critical ☒ Less Immediate

Last possible date for meeting: January 11, 2013 (i.e., does the meeting need to occur before a particular date)

If the meeting is critical, please explain why:

Location of Meeting: ARN 5400 and video with OAQPS-RTP

Length of Meeting: 1 hour

DATES TO AVOID: None

OAQPS	Steve Page
OAQPS	Mike Koerber
OAQPS/AQPD	Scott Mathias*
OAQPS/AQPD	Tom Coda*
OAQPS/AQPD	Krishna Viswanathan*
OAQPS/AQPD	Raj Rao
OAQPS/SPPD	Bruce Moore
OAQPS/SPPD	David Cozzie
OGC	Sara Schneeberg
OGC	Kristi Smith*
Region 8	Jim Martin
Region 8	Kate Fay*
Region 8	Derrith Watchman-Moore
Region 8	Callie Videtich*
Region 8	Carl Daly*
Region 8	Scott Jackson*
Region 8	Sara Lauman*
Region 8	Tim Russ

cc:

OAQPS/AQPD	Anna Wood
OAQPS/SPPD	Peter Tsirigotis
OAQPS/HEID	Lydia Wegman
OAQPS/AQAD	Chet Wayland
OAQPS/OID	Greg Green

Janet McCabe/DC/USEPA/US

Sent by: Cindy Huang

12/27/2012 08:54 AM

To Bruce Moore, Carl Daly, David Cozzie, Derrith Watchman-Moore, Jim Martin, Kate Fay, Krishna Viswanathan, Kristi Smith, Mike Koerber, Raj Rao, Sara Laumann, Sara Schneeberg, Scott Jackson, Scott Mathias, Steve Page, Tim Russ, Tom Coda

cc Anna Wood, Daniel Hopkins, Gregory Green, Jean Walker, Johnetta Heilig, Lala Alston, Larke Williams, Lydia Wegman, Maria Sanders, Nancy Perry, Peter Tsirigotis, Richard Wayland

bcc

Subject Rescheduled: Options for BLM to Demonstrate General Conformity for Upper Green River Basin, WY Oil and Gas Projects (Jan 9 11:00 AM EST in ARN-OAR-Room-5415/DC-ARN-OAR@EPA)

OAR Meeting Request Form

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cc:

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OAQPS/HEID	Lydia Wegman
OAQPS/AQAD	Chet Wayland
OAQPS/OID	Greg Green

Cole Anderson
<cole.anderson@wyo.gov>
11/08/2012 03:20 PM

To: Carl Daly
cc: Steve Dietrich, Tina Anderson
bcc:
Subject: Re: 2 Questions on General Conformity

Carl,

Attached are the permit examples Tina referenced in her last email. Two documents, 13400ana.pdf and 13194ana.pdf, are final analyses that were drafted for oil and gas sites in the non-attainment area. We organize our analyses (a.k.a. statement of basis) to address the proposed project and applicable regulations in the beginning. Next we list our proposed permit conditions. Finally, we include emissions tables and a table showing the offset calculation for the proposed project,

Also attached to the email are electronic versions of spreadsheets that we generate for each application. The spreadsheet is one large table of all permitting actions for the company that involve offsets. This spreadsheet and the Division's analysis are published for public comment.

No comments were received on these two applications. Final permits for both applications were issued on July 24, 2012. Electronic copies of the final permits are attached.

If you have any questions, please don't hesitate to contact me.

Best regards,

Cole Anderson
New Source Review Program Manager

Wyoming DEQ
Air Quality Division
Herschler Building, 2E
122 West 25th St.
Cheyenne, WY 82002
Phone: (307) 777-5924 FAX: (307) 777-5616
Email: cole.anderson@wyo.gov

On Thu, Nov 8, 2012 at 10:36 AM, Tina Anderson <tina.anderson@wyo.gov> wrote:

Carl,

You called Steve and I yesterday with a couple of followup questions from our general conformity meeting. Cole Anderson is pulling up some permit examples that you requested and we will forward those to you soon. In response to your other question regarding a remark by BLM about emissions associated with APDs, we can tell you that the estimate probably should have been expressed as hundreds of tons not thousands. Furthermore, the estimate is high largely because of mobile sources (such as haul trucks and vehicle traffic etc.) and the non-road component (drill engines, fracking engines, completion engines etc.). As you know, we don't regulate either mobile category through permitting so these are generally numbers not accounted for in a minor source permit. General Conformity, however, requires that the Federal

Agency look at all emissions associated with a well pad, so those estimates are higher than what you see in a permit. The permits continue to be minor source permits. The permits will sometimes include the drill rig emissions if the company has volunteered to submit to that process, but even those controlled scenarios are handled through minor source permits. Nevertheless, the federal agency is still left with the problem of emissions over the de minimus for individual APDs, and the degree to which those emissions are over is largely dependent upon whether the Federal agency can exclude the permitted portion. I hope this addresses your concern. Please feel free to call Steve, or myself if you have further questions. Many thanks to you and Kate and Tim for making the trip up to Cheyenne.

Tina

--

Christine (Tina) Anderson
State Implementation Planning and Rule Development
Air Quality Division, State of Wyoming
[307-675-5624](tel:307-675-5624)
tina.anderson@wyo.gov

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E-Mail to and from me, in connection with the transaction of public business, is subject to the Wyoming Public Records Act and may be disclosed to third parties.



13400ana.pdf



13400offset.pdf



13194ana.pdf



13194offset.pdf



13400per.pdf



13194per.pdf

Janet McCabe/DC/USEPA/US

Sent by: Emily Atkinson

12/13/2012 12:11 PM

To Bruce Moore, Carl Daly, David Cozzie, Derrith Watchman-Moore, Jim Martin, Kate Fay, Krishna Viswanathan, Kristi Smith, Mike Koerber, Raj Rao, Sara Laumann, Sara Schneeberg, Scott Jackson, Scott Mathias, Steve Page, Tim Russ, Tom Coda

cc Anna Wood, Daniel Hopkins, Gregory Green, Jean Walker, Johnetta Heilig, Lala Alston, Larke Williams, Lydia Wegman, Maria Sanders, Nancy Perry, Peter Tsirigotis, Richard Wayland

bcc

Subject Rescheduled: Options for BLM to Demonstrate General Conformity for Upper Green River Basin, WY Oil and Gas Projects (Jan 7 11:00 AM EST in ARN-OAR-Room-5415/DC-ARN-OAR@EPA)

OAR Meeting Request Form

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Length of Meeting: 1 hour

DATES TO AVOID: None

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OAQPS	Mike Koerber
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Region 8	Scott Jackson*
Region 8	Sara Lauman*
Region 8	Tim Russ

cc:

OAQPS/AQPD	Anna Wood
OAQPS/SPPD	Peter Tsirigotis
OAQPS/HEID	Lydia Wegman
OAQPS/AQAD	Chet Wayland
OAQPS/OID	Greg Green

Kate Fay/R8/USEPA/US
08/30/2012 08:00 AM

To john.corra, "Simpson, Donald A", "Green, Buddy W",
steve.dietrich
cc Carl Daly, Suzanne Bohan
bcc
Subject General Conformity

All:

We have completed our "internal due diligence" on the follow-up questions (listed below) that both BLM and WDEQ have asked us regarding general conformity as it affects oil and gas development in Wyoming. We would like very much to meet with you/your staff BEFORE your planned meeting next week with the industry to discuss answers to these questions. I think what we have found is key to your message to the industry so I strongly urge that we talk beforehand. I am not sure when your meeting is scheduled, but we can make just about anytime work next week (except Monday, since it is a holiday).

- 1) When does general conformity start to apply in the Upper Green River Basin (UGRB) marginal ozone nonattainment area?
- 2) What general conformity provisions would govern BLM's conformity evaluations in the UGRB marginal ozone nonattainment area?
- 3) Starting July 20, 2013, does BLM have to perform conformity evaluations for new Approvals for Permits to Drill (APDs) in the UGRB that are based on Records of Decision /Final Environmental Impact Statements issued before July 20, 2013?
- 4) To what degree can BLM rely on WDEQ's minor source rule in developing an approach to meeting general conformity requirements triggered by NEPA-related federal actions?

Thanks and I look forward to hearing from you.

Kate

Many thanks
Kate Fay
Senior Advisor
Energy and Climate
Office of the Regional Administrator
U.S. EPA Region 8
303.910.2830 (cell)
303.312.6432 (office)

Kate Fay/R8/USEPA/US
01/04/2013 11:54 AM

To: Scott Jackson
cc
bcc
Subject: Fw: Updates on General Conformity Issues

FYI....things heating up...as usual.

Kate

Kate Fay
Senior Advisor
Energy and Climate
Office of the Regional Administrator
U.S. EPA Region 8
303.910.2830 (cell)
303.312.6432 (office)

----- Forwarded by Kate Fay/R8/USEPA/US on 01/04/2013 11:53 AM -----

From: Tina Anderson <tina.anderson@wyo.gov>
To: Kate Fay/R8/USEPA/US@EPA
Cc: Carl Daly/R8/USEPA/US@EPA, Steve Dietrich <steve.dietrich@wyo.gov>
Date: 01/04/2013 10:01 AM
Subject: Re: Updates on General Conformity Issues

At this point, we are available mornings on: Friday 1/11 or monday 1/14 or tuesday 1/15. The sooner the better with BLM's plans for a meeting.

On Fri, Jan 4, 2013 at 9:32 AM, <Fay.Kate@epamail.epa.gov> wrote:
Sure. Carl is out until Monday. Late next week or following Monday?

From: Tina Anderson [tina.anderson@wyo.gov]
Sent: 01/04/2013 09:29 AM MST
To: Carl Daly; Kate Fay
Cc: Steve Dietrich <steve.dietrich@wyo.gov>
Subject: Updates on General Conformity Issues

Carl and Kate,

Hope you survived the holidays. You have probably already found our SIP revision to WY General Conformity Provisions in your in basket, as we completed our state rulemaking in mid-December. While we know it will take some time to review and approve our SIP submittal, we are wondering if we could talk with you on your current thinking on interpreting federal general conformity rules. BLM is setting up a meeting with the State and NPL operators to talk about what is required for general conformity and we can't move ahead without resolving some of the critical issues around minor sources. Are you available to conference sometime next week? We are available Tuesday 1/8/13 between 10 - 12 am or after 3 pm or again on Friday 1/11 between 8 and noon.

Thank you for your support and interest in this matter,
Tina

--

Christine (Tina) Anderson
State Implementation Planning and Rule Development
Air Quality Division, State of Wyoming
[307-675-5624](tel:307-675-5624) - Sheridan
[307-777-7391](tel:307-777-7391) - Cheyenne
tina.anderson@wyo.gov

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--

Christine (Tina) Anderson
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Air Quality Division, State of Wyoming
307-675-5624 - Sheridan
307-777-7391 - Cheyenne
tina.anderson@wyo.gov

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Kate Fay/R8/USEPA/US

08/30/2012 09:35 AM

To Suzanne Bohan

cc "Green, Buddy W", Carl Daly, "Simpson, Donald A",
john.corra, steve.dietrich, "Tuers, Charis A"
bcc

Subject Re: General Conformity

Thanks, Suzanne,. Sorry for my oversight!

Kate

Kate Fay
Senior Advisor
Energy and Climate
Office of the Regional Administrator
U.S. EPA Region 8
303.910.2830 (cell)
303.312.6432 (office)

Suzanne Bohan

I am adding Charis to this email list sin...

08/30/2012 09:32:49 AM

From: Suzanne Bohan/R8/USEPA/US
To: Kate Fay/R8/USEPA/US@EPA, "Green, Buddy W" <bwgreen@blm.gov>, Carl
Daly/R8/USEPA/US@EPA, "Simpson, Donald A" <dsimpson@blm.gov>, john.corra@wyo.gov,
steve.dietrich@wyo.gov, "Tuers, Charis A" <ctuers@blm.gov>
Date: 08/30/2012 09:32 AM
Subject: Re: General Conformity

I am adding Charis to this email list since she brought several of these general conformity questions to EPA's attention.

Thanks,
Suzanne

Suzanne J. Bohan
Director, NEPA Compliance and Review Program
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop
Denver, CO 80202-1129
Phone: (303) 312-6925
E-mail: bohan.suzanne@epa.gov

Kate Fay

All: We have completed our "internal du...

08/30/2012 08:00:31 AM

Kate Fay/R8/USEPA/US

01/04/2013 11:53 AM

To Tina Anderson

cc Carl Daly, Steve Dietrich

bcc

Subject Re: Updates on General Conformity Issues

Tina: Just left you a voicemail message regarding timing. We could likely connect on th 14th or 15th and maybe on the 11th, depending on schedules. I need to speak with Carl Monday and one of us will get back to you.

Thanks

Kate Fay
Senior Advisor
Energy and Climate
Office of the Regional Administrator
U.S. EPA Region 8
303.910.2830 (cell)
303.312.6432 (office)

Tina Anderson

At this point, we are available mornings...

01/04/2013 10:01:23 AM

From: Tina Anderson <tina.anderson@wyo.gov>
To: Kate Fay/R8/USEPA/US@EPA
Cc: Carl Daly/R8/USEPA/US@EPA, Steve Dietrich <steve.dietrich@wyo.gov>
Date: 01/04/2013 10:01 AM
Subject: Re: Updates on General Conformity Issues

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Sent: 01/04/2013 09:29 AM MST
To: Carl Daly; Kate Fay
Cc: Steve Dietrich <steve.dietrich@wyo.gov>
Subject: Updates on General Conformity Issues

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Thank you for your support and interest in this matter,

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Air Quality Division, State of Wyoming

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Kate Fay/R8/USEPA/US

01/04/2013 12:29 PM

To Tina Anderson

cc Carl Daly, Steve Dietrich

bcc

Subject Re: Updates on General Conformity Issues

Sounds good. Thanks.

Kate Fay
Senior Advisor
Energy and Climate
Office of the Regional Administrator
U.S. EPA Region 8
303.910.2830 (cell)
303.312.6432 (office)

Tina Anderson

Thanks, Kate. We will wait to hear bac...

01/04/2013 12:28:28 PM

From: Tina Anderson <tina.anderson@wyo.gov>
To: Kate Fay/R8/USEPA/US@EPA
Cc: Carl Daly/R8/USEPA/US@EPA, Steve Dietrich <steve.dietrich@wyo.gov>
Date: 01/04/2013 12:28 PM
Subject: Re: Updates on General Conformity Issues

Thanks, Kate. We will wait to hear back from you.

On Fri, Jan 4, 2013 at 11:53 AM, <Fay.Kate@epamail.epa.gov> wrote:

Tina: Just left you a voicemail message regarding timing. We could likely connect on th 14th or 15th and maybe on the 11th, depending on schedules. I need to speak with Carl Monday and one of us will get back to you.

Thanks

Kate Fay
Senior Advisor
Energy and Climate
Office of the Regional Administrator
U.S. EPA Region 8
[303.910.2830](tel:303.910.2830) (cell)
[303.312.6432](tel:303.312.6432) (office)

▼ Tina Anderson ---01/04/2013 10:01:23 AM---At this point, we are available mornings on: Friday 1/11 or monday 1/14 or tuesday 1/15. The sooner

From: Tina Anderson <tina.anderson@wyo.gov>
To: Kate Fay/R8/USEPA/US@EPA

Cc: Carl Daly/R8/USEPA/US@EPA, Steve Dietrich <steve.dietrich@wyo.gov>
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Kate Fay/R8/USEPA/US

01/04/2013 09:32 AM

To "Tina Anderson", Carl Daly

cc "Steve Dietrich"

bcc

Subject Re: Updates on General Conformity Issues

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Sent: 01/04/2013 09:29 AM MST

To: Carl Daly; Kate Fay

Cc: Steve Dietrich <steve.dietrich@wyo.gov>

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Christine (Tina) Anderson

State Implementation Planning and Rule Development

Air Quality Division, State of Wyoming

307-675-5624 - Sheridan

307-777-7391 - Cheyenne

tina.anderson@wyo.gov

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Kristi Smith/DC/USEPA/US
09/04/2012 04:03 PM

To Sara Laumann
cc
bcc
Subject Re: FYI

Thanks for letting me know. Given recent issues, do you want me to be involved?

Also, does Reg. 8 have an objection to OGC participating in the Deseret meeting? OAQPS informed Jim of the meeting, but they didn't want to invite OGC since Reg. 8 called the meeting.

Kristi M. Smith * US EPA, Office of General Counsel, Air and Radiation Law Office * (202) 564-3068 (office) * (202) 564-5603 (fax) * Mail Code 2344A

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Sara Laumann

Sara Laumann

09/04/2012 02:20:43 PM

From: Sara Laumann/R8/USEPA/US
To: Kristi Smith/DC/USEPA/US@EPA
Date: 09/04/2012 02:20 PM
Subject: FYI

Invitation: WY General Conformity Questions: Meeting Room TBD

Thu 09/06/2012 8:30 AM - 9:15

AM

Attendance is required for Sara Laumann

Chair: **Carl Daly/R8/USEPA/US**

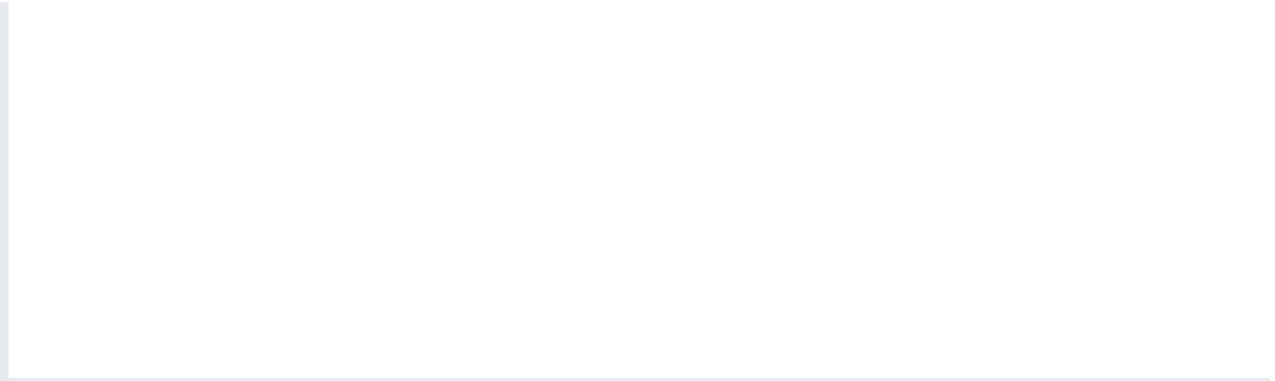
No Location Information

Carl Daly has invited you to a meeting. You have not yet responded.

Required: Kate Fay/R8/USEPA/US@EPA, Kenneth Distler/R8/USEPA/US@EPA, Sara Laumann/R8/USEPA/US@EPA, Scott Jackson/R8/USEPA/US@EPA, Suzanne Bohan/R8/USEPA/US@EPA, Tim Russ/R8/USEPA/US@EPA,
Optional: Callie Videtich/P2/R8/USEPA/US@EPA,

Description

I talked to WY DEQ today and they confirmed that they have the same understanding as BLM concerning the GC exemption for sources issued minor NSR permits - including sources such as drill rigs. WY believes that if they issue an NSR permit, whether that permit was required or just requested (such as for a drill rig), that permitted source should be exempted from GC. So, we need to discuss the Agency's position on this permit exemption quickly so we can get back to BLM and the DEQ quickly. Thanks

A decorative L-shaped line consisting of a vertical segment on the left and a horizontal segment extending to the right, both in a light gray color.

Sara Laumann
Associate Regional Counsel
EPA Region 8
Office of Regional Counsel
1595 Wynkoop
Denver, CO 80202-1129
Phone: 303-312-6443

Sara Laumann/R8/USEPA/US

To Carl Daly

03/06/2012 10:08 AM

cc

bcc

Subject Re: Fw: NPL EIS Conformity White Paper

Thanks!

Sara Laumann
EPA Region 8
Office of Regional Counsel
1595 Wynkoop
Denver, CO 80202-1129
Phone: 303-312-6443

Carl Daly

Just got this from WY - Encana's white...

03/06/2012 09:58:45 AM

From: Carl Daly/R8/USEPA/US
To: Sara Laumann/R8/USEPA/US@EPA, Tim Russ/R8/USEPA/US@EPA, Morales.monica@epa.gov, Kate Fay/R8/USEPA/US@EPA, Kenneth Distler/R8/USEPA/US@EPA, Scott Jackson/R8/USEPA/US@EPA, Jody Ostendorf/R8/USEPA/US@EPA, Tom Coda/RTP/USEPA/US@EPA
Date: 03/06/2012 09:58 AM
Subject: Fw: NPL EIS Conformity White Paper

Just got this from WY - Encana's white paper on general conformity.

Carl Daly 303-312-6416

----- Forwarded by Carl Daly/R8/USEPA/US on 03/06/2012 09:57 AM -----

From: Steve Dietrich <steve.dietrich@wyo.gov>
To: Carl Daly/R8/USEPA/US@EPA
Date: 03/06/2012 09:46 AM
Subject: Fwd: NPL EIS Conformity White Paper

Here you go.

Steven A. Dietrich, P.E.

AQD Administrator
Wyoming DEQ
122 West 25th Street
Cheyenne, WY 82002

E-mail: Steve.Dietrich@wyo.gov
Phone: (307) 777-7391
Fax: (307) 777-5616

----- Forwarded message -----

From: **Shaffron, Michael** <Michael.Shaffron@encana.com>
Date: Tue, Feb 28, 2012 at 2:04 PM

Subject: NPL EIS Conformity White Paper

To: "dsimpson@blm.gov" <dsimpson@blm.gov>, "sdefores@blm.gov" <sdefores@blm.gov>, "bohan.suzanne@epa.gov" <bohan.suzanne@epa.gov>, "Corra@wyo.gov" <Corra@wyo.gov>, "Steve.Dietrich@wyo.gov" <Steve.Dietrich@wyo.gov>, "darla.potter@wyo.gov" <darla.potter@wyo.gov>

Cc: "Ulrich, Paul" <Paul.Ulrich@encana.com>, "Phillips, Randy" <Randal.Phillips@encana.com>, "Enger, Erika Z." <Erika.Enger@encana.com>, "Gwaltney, Julia" <Julia.Gwaltney@encana.com>, "Stewart, David A." <David.Stewart@encana.com>, "Buehler, Lauren C." <Lauren.Buehler@encana.com>, "Gardner, John C." <John.Gardner@encana.com>

Dear Interagency Team Members:

Encana has prepared the attached White Paper which addresses Aspects and Impacts of an impending Ozone Nonattainment Designation and Conformity Issues related to the proposed Normally Pressured Lance (NPL) natural gas development project and associated Environmental Impact Statement (EIS) project. We hope you will find this document helpful when discussing how the proposed Upper Green River Basin Marginal Ozone Nonattainment Area may affect the continued progress of the NPL EIS.

Thank You,

Mike S.

Mike Shaffron, P.E.

NRBU EHS Lead - Permitting & Compliance

Encana Oil & Gas (USA) Inc .

Republic Plaza

370 17th Street, Suite 1700

Denver, CO 80202

Phone: [\(720\) 876-5155](tel:(720)876-5155)

Fax: [\(720\) 876-6155](tel:(720)876-6155)

Cell: [\(720\) 375-4888](tel:(720)375-4888)

Email: michael.shaffron@encana.com

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<http://www.encana.com>

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[attachment "Conformity White Paper.pdf" deleted by Sara Laumann/R8/USEPA/US]

Sara Laumann/R8/USEPA/US

To Kristi Smith

09/04/2012 12:20 PM

cc

bcc

Subject FYI

Invitation: WY General Conformity Questions: Meeting Room TBD

Thu 09/06/2012 8:30 AM - 9:15

AM

Attendance is required for Sara Laumann

Chair: **Carl Daly/R8/USEPA/US**

No Location Information

Carl Daly has invited you to a meeting. You have not yet responded.

Required:

Kate Fay/R8/USEPA/US@EPA, Kenneth Distler/R8/USEPA/US@EPA, Sara Laumann/R8/USEPA/US@EPA, Scott Jackson/R8/USEPA/US@EPA, Suzanne Bohan/R8/USEPA/US@EPA, Tim Russ/R8/USEPA/US@EPA,

Optional:

Callie Videtich/P2/R8/USEPA/US@EPA,

Description

I talked to WY DEQ today and they confirmed that they have the same understanding as BLM concerning the GC exemption for sources issued minor NSR permits - including sources such as drill rigs. WY believes that if they issue an NSR permit, whether that permit was required or just requested (such as for a drill rig), that permitted source should be exempted from GC. So, we need to discuss the Agency's position on this permit exemption quickly so we can get back to BLM and the DEQ quickly. Thanks

Sara Laumann
Associate Regional Counsel
EPA Region 8
Office of Regional Counsel
1595 Wynkoop

Denver, CO 80202-1129
Phone: 303-312-6443

Steve Dietrich
<steve.dietrich@wyo.gov>
08/07/2012 02:29 PM

To Carl Daly
cc Tina Anderson, Darla Potter
bcc
Subject Wyoming's General Conformity Letter to BLM

Carl:

I have attached our letter to the BLM that I spoke to you about this morning. It is being mailed to everyone today. Keep us in mind for a future conference call to discuss the letter or other General Conformity issues with the BLM.

[Steven A. Dietrich, P.E.](#)

AQD Administrator
Wyoming DEQ
122 West 25th Street
Cheyenne, WY 82002

E-mail: Steve.Dietrich@wyo.gov
Phone: (307) 777-7391
Fax: (307) 777-5616

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DEQBLMLtrGenConformYearGraceAug2012.pdf

**Suzanne
Bohan/R8/USEPA/US**
08/30/2012 09:32 AM

To Kate Fay, "Green, Buddy W", Carl Daly, "Simpson, Donald
A", john.corra, steve.dietrich, "Tuers, Charis A"
cc
bcc
Subject Re: General Conformity

I am adding Charis to this email list since she brought several of these general conformity questions to EPA's attention.

Thanks,
Suzanne

Suzanne J. Bohan
Director, NEPA Compliance and Review Program
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop
Denver, CO 80202-1129
Phone: (303) 312-6925
E-mail: bohan.suzanne@epa.gov

Kate Fay All: We have completed our "internal du... 08/30/2012 08:00:31 AM

From: Kate Fay/R8/USEPA/US
To: john.corra@wyo.gov, "Simpson, Donald A" <dsimpson@blm.gov>, "Green, Buddy W" <bwggreen@blm.gov>, steve.dietrich@wyo.gov
Cc: Carl Daly/R8/USEPA/US@EPA, Suzanne Bohan/R8/USEPA/US@EPA
Date: 08/30/2012 08:00 AM
Subject: General Conformity

All:

We have completed our "internal due diligence" on the follow-up questions (listed below) that both BLM and WDEQ have asked us regarding general conformity as it affects oil and gas development in Wyoming. We would like very much to meet with you/your staff BEFORE your planned meeting next week with the industry to discuss answers to these questions. I think what we have found is key to your message to the industry so I strongly urge that we talk beforehand. I am not sure when your meeting is scheduled, but we can make just about anytime work next week (except Monday, since it is a holiday).

- 1) When does general conformity start to apply in the Upper Green River Basin (UGRB) marginal ozone nonattainment area?
- 2) What general conformity provisions would govern BLM's conformity evaluations in the UGRB marginal ozone nonattainment area?
- 3) Starting July 20, 2013, does BLM have to perform conformity evaluations for new Approvals for Permits to Drill (APDs) in the UGRB that are based on Records of Decision /Final Environmental Impact Statements issued before July 20, 2013?
- 4) To what degree can BLM rely on WDEQ's minor source rule in developing an approach to meeting general conformity requirements triggered by NEPA-related federal actions?

Thanks and I look forward to hearing from you.

Kate

Many thanks
Kate Fay
Senior Advisor
Energy and Climate
Office of the Regional Administrator
U.S. EPA Region 8
303.910.2830 (cell)
303.312.6432 (office)

Tim Russ/R8/USEPA/US

08/30/2012 08:25 AM

To Carl Daly

cc Christopher Razzazian, "Scott Jackson", "rothery deirdre"

bcc Tim Russ

Subject Re: Fw: General Conformity - BLM & Industry Meeting

Hey Carl,

My understanding from Ken Distler is that this BLM / Industry meeting is scheduled for Tues. Sept. 4th. Hopefully something can be set up (via Kate?) for today or Friday to talk with BLM / WyDEQ.

Will advise if this BLM meeting date is different than the 4th.

Tim

Tim Russ
Environmental Scientist
USEPA Region 8
Air Program
1595 Wynkoop Street (8P-AR)
Denver, CO 80202-1129
Ph. (303) 312-6479
Fax (303) 312-6064
e-mail: russ.tim@epa.gov

Carl Daly

FYI on this GC email to BLM. If the call...

08/30/2012 08:16:17 AM

From: Carl Daly/R8/USEPA/US
To: "Tim Russ" <Russ.Tim@epamail.epa.gov>, Christopher Razzazian, "Scott Jackson" <Jackson.Scott@epamail.epa.gov>
Cc: "rothery deirdre" <rothery.deirdre@epa.gov>
Date: 08/30/2012 08:16 AM
Subject: Fw: General Conformity

FYI on this GC email to BLM. If the call happens Weds I will be in UT so Scott will be acting for (like) me.
Carl Daly 303-312-6416

Kate Fay

----- Original Message -----

From: Kate Fay
Sent: 08/30/2012 08:00 AM MDT
To: john.corra@wyo.gov; "Simpson, Donald A" <dsimpson@blm.gov>; "Green, Buddy W" <bwggreen@blm.gov>; steve.dietrich@wyo.gov
Cc: Carl Daly; Suzanne Bohan
Subject: General Conformity

All:

We have completed our "internal due diligence" on the follow-up questions (listed below) that both BLM and WDEQ have asked us regarding general conformity as it affects oil and gas development in Wyoming. We would like very much to meet with you/your staff BEFORE your planned meeting next week with the industry to discuss answers to these questions. I think what we have found is key to your message to the industry so I strongly urge that we talk beforehand. I am not sure when your meeting is scheduled, but we can make just about anytime work next week (except Monday, since it is a holiday).

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- 4) To what degree can BLM rely on WDEQ's minor source rule in developing an approach to meeting general conformity requirements triggered by NEPA-related federal actions?

Thanks and I look forward to hearing from you.

Kate

Many thanks
Kate Fay
Senior Advisor
Energy and Climate
Office of the Regional Administrator
U.S. EPA Region 8
303.910.2830 (cell)
303.312.6432 (office)

Tim Russ/R8/USEPA/US

08/30/2012 04:08 PM

To Scott Jackson

cc

bcc

Subject Fw: General Conformity (2 of 3 emails)

Scott,

FYI -

Tim

----- Forwarded by Tim Russ/R8/USEPA/US on 08/30/2012 04:07 PM -----

From: Kenneth Distler/R8/USEPA/US
To: Tim Russ/R8/USEPA/US@EPA
Date: 08/30/2012 09:13 AM
Subject: Fw: General Conformity

FYI

----- Forwarded by Kenneth Distler/R8/USEPA/US on 08/30/2012 09:11 AM -----

From: Kenneth Distler/R8/USEPA/US
To: Suzanne Bohan/R8/USEPA/US@EPA
Date: 08/30/2012 09:10 AM
Subject: Re: Fw: General Conformity

Yes send to Charis... not sure how well Buddy responds to staff.

\

Suzanne Bohan

Ken - Should I forward this to Charis? ...

08/30/2012 08:55:07 AM

From: Suzanne Bohan/R8/USEPA/US
To: Kenneth Distler/R8/USEPA/US@EPA
Date: 08/30/2012 08:55 AM
Subject: Fw: General Conformity

Ken - Should I forward this to Charis?

Suzanne J. Bohan
Director, NEPA Compliance and Review Program
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop
Denver, CO 80202-1129
Phone: (303) 312-6925
E-mail: bohan.suzanne@epa.gov

----- Forwarded by Suzanne Bohan/R8/USEPA/US on 08/30/2012 08:54 AM -----

From: Kate Fay/R8/USEPA/US
To: john.corra@wyo.gov, "Simpson, Donald A" <dsimpson@blm.gov>, "Green, Buddy W" <bwggreen@blm.gov>, steve.dietrich@wyo.gov
Cc: Carl Daly/R8/USEPA/US@EPA, Suzanne Bohan/R8/USEPA/US@EPA
Date: 08/30/2012 08:00 AM
Subject: General Conformity

All:

We have completed our "internal due diligence" on the follow-up questions (listed below) that both BLM and WDEQ have asked us regarding general conformity as it affects oil and gas development in Wyoming. We would like very much to meet with you/your staff BEFORE your planned meeting next week with the industry to discuss answers to these questions. I think what we have found is key to your message to the industry so I strongly urge that we talk beforehand. I am not sure when your meeting is scheduled, but we can make just about anytime work next week (except Monday, since it is a holiday).

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Thanks and I look forward to hearing from you.

Kate

Many thanks
Kate Fay
Senior Advisor
Energy and Climate
Office of the Regional Administrator
U.S. EPA Region 8
303.910.2830 (cell)
303.312.6432 (office)

Tina Anderson
<tina.anderson@wyo.gov>

01/04/2013 09:29 AM

To Carl Daly, Kate Fay

cc Steve Dietrich

bcc

Subject Updates on General Conformity Issues

Carl and Kate,

Hope you survived the holidays. You have probably already found our SIP revision to WY General Conformity Provisions in your in basket, as we completed our state rulemaking in mid-December. While we know it will take some time to review and approve our SIP submittal, we are wondering if we could talk with you on your current thinking on interpreting federal general conformity rules. BLM is setting up a meeting with the State and NPL operators to talk about what is required for general conformity and we can't move ahead without resolving some of the critical issues around minor sources. Are you available to conference sometime next week? We are available Tuesday 1/8/13 between 10 - 12 am or after 3 pm or again on Friday 1/11 between 8 and noon.

Thank you for your support and interest in this matter,

Tina

--

Christine (Tina) Anderson
State Implementation Planning and Rule Development
Air Quality Division, State of Wyoming
307-675-5624 - Sheridan
307-777-7391 - Cheyenne
tina.anderson@wyo.gov

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Tina Anderson
<tina.anderson@wyo.gov>

11/08/2012 10:36 AM

To Carl Daly

cc Steve Dietrich, Cole Anderson

bcc

Subject 2 Questions on General Conformity

Carl,

You called Steve and I yesterday with a couple of followup questions from our general conformity meeting. Cole Anderson is pulling up some permit examples that you requested and we will forward those to you soon. In response to your other question regarding a remark by BLM about emissions associated with APDs, we can tell you that the estimate probably should have been expressed as hundreds of tons not thousands. Furthermore, the estimate is high largely because of mobile sources (such as haul trucks and vehicle traffic etc.) and the non-road component (drill engines, fracking engines, completion engines etc.). As you know, we don't regulate either mobile category through permitting so these are generally numbers not accounted for in a minor source permit. General Conformity, however, requires that the Federal Agency look at all emissions associated with a well pad, so those estimates are higher than what you see in a permit. The permits continue to be minor source permits. The permits will sometimes include the drill rig emissions if the company has volunteered to submit to that process, but even those controlled scenarios are handled through minor source permits. Nevertheless, the federal agency is still left with the problem of emissions over the de minimus for individual APDs, and the degree to which those emissions are over is largely dependent upon whether the Federal agency can exclude the permitted portion. I hope this addresses your concern. Please feel free to call Steve, or myself if you have further questions. Many thanks to you and Kate and Tim for making the trip up to Cheyenne.

Tina

--

Christine (Tina) Anderson
State Implementation Planning and Rule Development
Air Quality Division, State of Wyoming
307-675-5624

tina.anderson@wyo.gov

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Tina Anderson
<tina.anderson@wyo.gov>
01/04/2013 10:01 AM

To Kate Fay
cc Carl Daly, Steve Dietrich
bcc
Subject Re: Updates on General Conformity Issues

At this point, we are available mornings on: Friday 1/11 or monday 1/14 or tuesday 1/15. The sooner the better with BLM's plans for a meeting.

On Fri, Jan 4, 2013 at 9:32 AM, <Fay.Kate@epamail.epa.gov> wrote:
Sure. Carl is out until Monday. Late next week or following Monday?

From: Tina Anderson [tina.anderson@wyo.gov]
Sent: 01/04/2013 09:29 AM MST
To: Carl Daly; Kate Fay
Cc: Steve Dietrich <steve.dietrich@wyo.gov>
Subject: Updates on General Conformity Issues

Carl and Kate,

Hope you survived the holidays. You have probably already found our SIP revision to WY General Conformity Provisions in your in basket, as we completed our state rulemaking in mid-December. While we know it will take some time to review and approve our SIP submittal, we are wondering if we could talk with you on your current thinking on interpreting federal general conformity rules. BLM is setting up a meeting with the State and NPL operators to talk about what is required for general conformity and we can't move ahead without resolving some of the critical issues around minor sources. Are you available to conference sometime next week? We are available Tuesday 1/8/13 between 10 - 12 am or after 3 pm or again on Friday 1/11 between 8 and noon.

Thank you for your support and interest in this matter,
Tina

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Christine (Tina) Anderson
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Air Quality Division, State of Wyoming
[307-675-5624](tel:307-675-5624) - Sheridan
[307-777-7391](tel:307-777-7391) - Cheyenne
tina.anderson@wyo.gov

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307-777-7391 - Cheyenne
tina.anderson@wyo.gov

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Tina Anderson
<tina.anderson@wyo.gov>
01/04/2013 12:27 PM

To: Kate Fay
cc: Carl Daly, Steve Dietrich
bcc:
Subject: Re: Updates on General Conformity Issues

Thanks, Kate. We will wait to hear back from you.

On Fri, Jan 4, 2013 at 11:53 AM, <Fay.Kate@epamail.epa.gov> wrote:

Tina: Just left you a voicemail message regarding timing. We could likely connect on th 14th or 15th and maybe on the 11th, depending on schedules. I need to speak with Carl Monday and one of us will get back to you.

Thanks

Kate Fay
Senior Advisor
Energy and Climate
Office of the Regional Administrator
U.S. EPA Region 8
[303.910.2830](tel:303.910.2830) (cell)
[303.312.6432](tel:303.312.6432) (office)

▼ Tina Anderson ---01/04/2013 10:01:23 AM---At this point, we are available mornings on: Friday 1/11 or monday 1/14 or tuesday 1/15. The sooner

From: Tina Anderson <tina.anderson@wyo.gov>
To: Kate Fay/R8/USEPA/US@EPA
Cc: Carl Daly/R8/USEPA/US@EPA, Steve Dietrich <steve.dietrich@wyo.gov>
Date: 01/04/2013 10:01 AM
Subject: Re: Updates on General Conformity Issues

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Sure. Carl is out until Monday. Late next week or following Monday?

From: Tina Anderson [tina.anderson@wyo.gov]
Sent: 01/04/2013 09:29 AM MST
To: Carl Daly; Kate Fay

Cc: Steve Dietrich <steve.dietrich@wyo.gov>
Subject: Updates on General Conformity Issues

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tina.anderson@wyo.gov

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--

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[307-777-7391](tel:307-777-7391) - Cheyenne
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